

EXHIBIT 314

DENISE GEORGE Confidential
GOVT OF US VI V. JPMORGAN CHASE

July 17, 2023

1

CONFIDENTIAL
UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK
CASE NUMBER: 22-CV-10904-JSR
ACTION FOR DAMAGES

GOVERNMENT OF THE UNITED STATES)
VIRGIN ISLANDS,)
)
Plaintiff,)
)
VS.)
)
JP MORGAN CHASE BANK, N.A.,)
)
Defendant.)
)

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VIDEO RECORDED DEPOSITION OF
DENISE GEORGE
MONDAY, JULY 17, 2023

REPORTED BY:

DENISE D. HARPER-FORDE
Certified Shorthand Reporter (CSR)
Certified RealTime Reporter (CRR)
Certified LiveNote Reporter (CLR)
Registered Professional Reporter (RPR)
Notary Public (FLORIDA)

1 THE WITNESS: I do not know.

2 I did not look to reassess the
3 tier. My -- my understanding when
4 I got there in reviewing it, there
5 was no indication to me
6 necessarily that, you know, it
7 would need to be reassessed.

8 He was already established,
9 and he had been there for quite
10 some time in a Tier 1. And it was
11 established previously, and there
12 was nothing that came before me
13 that would have expected that we
14 would need to change that.

15 (BY ATTORNEY O'LAUGHLIN):

16 Q. But the waivers were being
17 reassessed?

18 A. I don't --

19 ATTORNEY ACKERMAN: Object to
20 form.

21 THE WITNESS: I don't know
22 what you just said. I do not
23 necessarily agree with that, that
24 the waivers were being reassessed.
25 What I know is that when I became

DENISE GEORGE Confidential
GOVT OF US VI V. JPMORGAN CHASE

July 17, 2023
142

1 Attorney General, it was brought
2 to me that Mr. Epstein was
3 requesting a waiver.

4 I was not re- -- necessarily
5 wanting to reassess anything. He
6 was requesting a waiver, and a
7 waiver to reduce -- in my
8 discretion, to -- to reduce or --
9 or to -- to waive altogether his
10 requirements, his reporting
11 requirements for travel. That is
12 it.

13 So that's what's before me.
14 What's before me wasn't, Oh, can
15 you reassess what, you know, this
16 person did or assess what that
17 person did. No. It's before me
18 for me to then make a decision.

19 Because whether or not anybody
20 else made a decision on it, at the
21 end of the day, I was the Attorney
22 General then, And the law requires
23 that it be done at the -- at the
24 discretion of the Attorney General
25 if there's information sufficient,

1 you know, to, I guess, convince
2 the Attorney General that there is
3 proof sufficient to show that
4 there is business that's being
5 done internationally or that he
6 has to travel internationally for
7 legitimate business or for any
8 other legitimate purpose.

9 So I took it as something I
10 have to make a decision on, not
11 necessarily that I'm assessing
12 anybody else's.

13 (BY ATTORNEY O'LAUGHLIN):

14 Q. So is it fair to say that the
15 reason that you were looking at the
16 waivers was because that had been
17 specifically brought up, but there was
18 no reason to look at the tiers because
19 no one had specifically brought that
20 to your attention?

21 ATTORNEY ACKERMAN: Objection
22 to form.

23 THE WITNESS: There was
24 nothing brought to my attention or
25 nothing that came to me that would

1 or, you know, that sort of thing would
2 have been going on on the island.

3 Q. And then what did you do after
4 you found out it came back that there
5 were no complaints?

6 A. I just -- well, I guess
7 personally I didn't -- well, what I
8 did was at that point in time, I just
9 started to really read a lot of the --
10 of the reports, and it's -- it's news
11 media reports.

12 Which is fairly hearsay to
13 hear -- to just get the gist of what
14 is being said even though I know that
15 you can't -- I can't just rely on --
16 on news media. I can't do that.

17 You know, it's rumor,
18 innuendo. But to see where they're
19 getting this information from and
20 what's happening because it became
21 even more of a curiosity for me and
22 thinking this is something we -- we
23 got to do something about, you know.

24 I don't know what happened
25 then, but I can't sit here and hear

DENISE GEORGE Confidential
GOVT OF US VI V. JPMORGAN CHASE

July 17, 2023
168

1 that all this happened, especially
2 when under our statutes, sexual
3 assaults and -- and child abuse are --
4 have no statute of limitations.

5 So it wouldn't have been too
6 late to do anything if we had solid
7 evidence, because I can't go by
8 innuendo. I can't go by rumor. I
9 can't go by media reports and say,
10 Okay, you know, let's, you know, do an
11 investigation.

12 And then I was also critically
13 short-staffed as well. I didn't have
14 the resources either. But it was
15 really where I was really
16 contemplating what can be done.

17 But once learning or
18 understanding that the federal
19 authorities were investigating
20 Mr. Epstein and prosecuting
21 criminally, and there was -- there
22 might have been a criminal
23 investigation going on.

24 That is something that I would
25 not do -- that it sort of preempts

1 going and doing something when once
2 the federal authorities or any other
3 authorities have started a criminal
4 investigation or that prosecutors.

5 They made the arrest. Then
6 that's sort of under, I think it's
7 called the First Forum Rule. It's --
8 it's like in respect to the other
9 forum, that you do not -- you know, we
10 won't go and, you know, start up a
11 prosecution when there's one already
12 there.

13 So it's been -- it pleased me
14 to see that something was being done
15 with law enforcement organization that
16 had the resources to be able to do it.
17 So once I learned that that was
18 happening. Okay, then at least
19 something is being done. There's a
20 prosecution.

21 And then I was very -- you
22 know, try to be in-tuned with what it
23 is and what the charges were once he
24 was arrested, and looking forward to
25 seeing Jeffrey Epstein brought to

1 justice. But also hearing more about
2 what happened and what part Little St.
3 James may have played in it.

4 Q. How did you learn that a
5 federal investigation was being
6 done?

7 A. I did not learn it for sure,
8 but I -- I don't recall exactly how --
9 there were certain questions that
10 might have been asked or something
11 that I -- I just sensed that there was
12 an investigation going on.

13 And I can't -- and it's not
14 something that I could -- would even
15 disclose, of course, even if I knew.
16 But I sensed that one was going on.

17 Q. Questions asked by who?

18 A. I can't tell you that. You
19 know, I mean, if there -- I just don't
20 recall exactly, but I think something
21 I read or something and in my mind I
22 said, Okay. That means that the
23 federal authorities must be
24 investigating.

25 That was my conclusion. It

DENISE GEORGE Confidential
GOVT OF US VI V. JPMORGAN CHASE

July 17, 2023
171

1 must have been from the media that I'd
2 been reading and the way things were
3 going, different things that were
4 said, that, you know, there's a
5 possibility that that's happening.

6 At the same time, Jeffrey
7 Epstein had gone on another trip with
8 our -- well, which he had reported to
9 Europe. And so I recall speaking with
10 Shani and saying, you know, all the
11 reports -- she assured me that he did
12 do the reporting as required.

13 But yeah, I sensed that. And
14 it turned out that my senses, my hunch
15 came out to be true because then he
16 was arrested July, in July. I think
17 July 10th.

18 ATTORNEY ACKERMAN: Counsel,
19 when you get a chance, I could use
20 a break. I'm not saying -- I'm
21 not asking for one now, just
22 saying when it's a good --

23 THE WITNESS: Sure.

24 ATTORNEY ACKERMAN: --
25 breaking point.